UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF TE09-33425-GWEESSEE, WESTERN DIVISION

In Re:

                                   Chapter 7

AUGUST ANTHONY GALLER
SSN: xxx-xx-4964

                                   Case No. 09-33425-GWE

        Debtor.

MOTION TO PERMIT LATE REAFFIRMATION AGREEMENT

        Comes now the above named debtor and moves this Honorable Court to permit the execution and filing of a late reaffirmation agreement with Wells Fargo Home Mortgage and respectfully represents:

        1. That this case was commenced by the filing of a voluntary petition for relief under chapter 7 of Title 11 of the United States Code. This case has not been closed but the discharge has been granted. Prior to the discharge debtor was unable to obtain a response from Wells Fargo Home Mortgage about reaffirming the mortgage.

        2. Debtor requests this court permit the execution and filing of a late reaffirmation agreement with Wells Fargo Home Mortgage (account number 0206544207) which is secured by a first mortgage of his residence at 1338 Cattail Cove, Germantown, TN 38138.

        3. Wells Fargo is requiring a reaffirmation agreement before it will refinance the mortgage with debtor and his spouse.

        WHEREFORE, it is prayed that debtor and Wells Fargo be permitted to execute and file a late reaffirmation agreement and to waive the requirements of 11 US Code Section 524(c)(1) and Bankruptcy Rule 4008(a), and for such other and further relief to which debtor may entitled.

                        /s/ Philip F. Counce _____
                        PHILIP F. COUNCE, Attorney for Debtor
                        3333 Poplar Ave., Memphis, TN 38111
                        Phone: (901) 458-0555

CERTIFICATE OF SERVICE

        The undersigned certifies that a copy of the foregoing motion and notice of electronic filing of same was served by mail, fax or electronically to the parties listed below under "PARTIES TO SERVE" on October 4, 2012.

/s/ Philip F. Counce_____
PHILIP F. COUNCE, Attorney at Law

PARTIES TO SERVE:

Debtor

Debtor's attorney

Chapter 7 Trustee

Wells Fargo Home Mortgage
One Home Campus
MAC ID # X2302-04C
Des Moines, IA 50328

Wells Fargo
Attn: Written Coirrespondence
Fax: (866)-278-1179